

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Robert Koch Eby, III
Debtor 1

PennyMac Loan Services, LLC
Movant(s)

v.

Robert Koch Eby, III

Respondent(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 20-13901-PMM

Matter: Motion for Relief from the Automatic Stay

Document No. 58

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Robert Koch Eby, II, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
7. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 7; therefore, it is denied. Strict proof is demanded.
8. Admitted in part, denied in part. Upon information and belief, it is admitted that the post-petition delinquency is \$4,418.40, and Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties. Debtor(s) are without sufficient knowledge as to whether or not the amount to reinstate the loan includes attorneys' fees and costs; therefore, it is denied. Strict proof is demanded.
9. Paragraph 9 contains a conclusion of law to which no response is required.
10. Paragraph 10 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: July 4, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Sunday, July 4, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee
2901 Saint Lawrence Avenue, Suite 100
Reading, PA 19606

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire